

LAW OFFICE OF DANIEL MARKS  
DANIEL MARKS, ESQ.  
Nevada State Bar No.: 002003  
NICOLE M. YOUNG, ESQ.  
Nevada State Bar No. 12659  
610 South Ninth Street  
Las Vegas, Nevada 89101  
Office@danielmarks.net

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PARNELL COLVIN,  
Plaintiff,

Case No. 2:20-cv-01765-APG-EJY

v.

**REPLY IN SUPPORT OF MOTION TO  
WITHDRAWAL AS COUNSEL FOR  
PLAINTIFF**

M.J. DEAN CONSTRUCTION, INC,  
Defendant,

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. FACTUAL BACKGROUND**

Undesigned counsel filed a Motion to Withdraw as Plaintiff's Counsel on October 31, 2022, stating that Plaintiff will not communicate with him by phone or in person. Undesigned counsel cannot represent Plaintiff when he will not communicate. Plaintiff has never given any reason why he will not communicate in person or by telephone.

Mr. Colvin filed a document on November 4, 2022, entitled "Reply to Motion to Withdraw and Request Hearing on Said Motion." Plaintiff does not deny he will not communicate in person or by phone. He claims his phone is "cracked," but that does not prevent phone use for an extended time. There is no explanation as to why Plaintiff who previously met frequently with counsel and responded to phone calls is now refusing to communicate by telephone or in person.

////

////

////

1 Undesigned counsel cannot adequately prepare Plaintiff for trial when Plaintiff steadfastly  
2 will not communicate by phone or meet in person. Respectively undesigned counsel requests this  
3 Court grant the Motion allowing counsel to withdraw.

4 DATED this 8 day of November, 2022.

5 LAW OFFICE OF DANIEL MARKS  
6 

7 DANIEL MARKS, ESQ.  
8 Nevada State Bar No. 002003  
9 NICOLE M. YOUNG, ESQ.  
10 Nevada State Bar No. 12659  
11 610 South Ninth Street  
12 Las Vegas, Nevada 89101  
13 Attorneys for Plaintiff  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

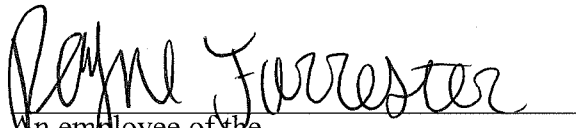
**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the LAW OFFICE OF DANIEL MARKS, and that on the 8 day of November, 2022, I did serve a true and correct copy of the above and foregoing **REPLY IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF** by way of Notice of Electronic Filing provided by the court mandated ECF filing service, upon the Defendant at the following:

Robert Rosenthal  
Howard & Howard Attorneys PLLC  
3800 Howard Hughes Parkway, Suite 1000  
Las Vegas, Nevada 89169  
Attorneys for Defendant

**Via U.S. First Class Mail and email:**

Parnell Colvin  
6681 Tara St.  
Las Vegas, Nevada 89146  
Email: [pc681@yahoo.com](mailto:pc681@yahoo.com)  
Plaintiff

  
An employee of the  
LAW OFFICE OF DANIEL MARKS